

**A&O SHEARMAN**

**VIA ECF**

Hon. Jennifer H. Rearden  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1010  
New York, NY 10007

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January 21, 2025

**Re: *United States v. Pablo Hernandez-Rodriguez*, 23-cr-00509-JHR-2**

Dear Judge Rearden,

We write on behalf of Defendant Pablo Hernandez-Rodriguez (“Mr. Hernandez”) pursuant to Rule 10(C)(ii) of Your Honor’s Individual Rules and Practices in Criminal Cases to request to file a redacted version of the forthcoming sentencing submission and exhibits. The sentencing submission contains medical information which can be redacted under Rule 10(A). The proposed redactions are photographs of family members, including children which we respectfully request be redacted pursuant to Rule 10(B).

Any redaction of a court filing must be narrowly tailored to serve whatever purpose justifies the redaction and must be consistent with the presumption in favor of public access to judicial documents. *See, e.g., Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 119-20 (2d Cir. 2006). These proposed redactions are narrowly tailored to protect the privacy of Mr. Hernandez’s children, who are not parties to this litigation, while maintaining the presumption in favor of public access to judicial documents. *See U.S. v. Litvak*, No. 3:13-cr-19, 2015 WL 328876 at \*2 (D. Conn. Jan. 23, 2015) (holding that the public has no right under the common law or the First Amendment to information concerning the identity of children not parties to a litigation).

We have consulted with the Government, and they do not object to these proposed redactions.

For these reasons, we respectfully request permission to publicly file a redacted submission, with an unredacted version to be provided to the Court.

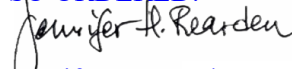
Respectfully,

**Eugene Ingoglia**  
Partner

Application GRANTED.

The Clerk of Court is directed to terminate ECF No. 108.

SO ORDERED.



Jennifer H. Rearden, U.S.D.J.

Dated: January 30, 2025.